

MWS: USAO#2019R00661

FILED
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

THOMAS MICHAEL MANNION,
JR.,

Defendant.

* CRIMINAL NO. **SAG-19-0466**
*
* (Production of Child Pornography,
* 18 U.S.C. § 2251(a); Distribution of
* Child Pornography, 18 U.S.C.
* § 2252(a)(2); Possession of Child
* Pornography, 18 U.S.C.
* § 2252A(a)(5)(B) and (b)(2));
* Forfeiture, 18 U.S.C. §§ 1594, 2253)

INDICTMENT

COUNT ONE

(Production of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about March 9, 2019, in the District of Maryland and elsewhere, the defendant,

THOMAS MICHAEL MANNION, JR.,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and the visual depictions were produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant produced visual depictions of a minor male, Minor Victim 1, each with a title that begins with "20190309," of which thirteen (13) images depict the lascivious display of Minor Victim 1's genitalia; five (5) images and two (2) videos depict Minor Victim 1's mouth on an adult male penis; one (1) image depicts Minor Victim 1's hand touching an adult penis; and at least one (1) image depicts an adult male penis touching Minor Victim 1's buttocks.

18 U.S.C. § 2251(a)

COUNT TWO
(Production of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about May 6, 2019, in the District of Maryland and elsewhere, the defendant,

THOMAS MICHAEL MANNION, JR.,

did knowingly employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing a visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant produced visual depictions of a minor male, Minor Victim 1, each with a title that begins with “20190506,” of which five (5) images depict the lascivious display of Minor Victim 1’s genitals; two (2) images depict an adult hand touching the buttocks of Minor Victim 1; and two images depict an adult male’s penis near Minor Victim 1’s buttocks with white liquid on Minor Victim 1’s back and buttocks.

18 U.S.C. § 2251(a)

COUNT THREE
(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 12, 2019, in the District of Maryland and elsewhere, the defendant,

THOMAS MICHAEL MANNION, JR.,

did unlawfully and knowingly distribute any visual depiction of a minor engaging in sexually explicit conduct using any means and facility of interstate and foreign commerce, and has been shipped and transported in and affecting interstate and foreign commerce, and which contains materials which have been mailed and so shipped and transported, by any means including by computer; to wit: **MANNION** used the Grindr computer application to distribute two (2) images depicting Minor Victim 1, a minor male, engaging in sexually explicit conduct, including but not limited to the lascivious display of the minor's genitals and pubic area.

18 U.S.C. § 2252(a)(2)

COUNT FOUR
(Distribution of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about March 25, 2019, in the District of Maryland and elsewhere, the defendant,

THOMAS MICHAEL MANNION, JR.,

did unlawfully and knowingly distribute any visual depiction of a minor engaging in sexually explicit conduct using any means and facility of interstate and foreign commerce, and has been shipped and transported in and affecting interstate and foreign commerce, and which contains materials which have been mailed and so shipped and transported, by any means including by computer; to wit: **MANNION** used the Grindr computer application to distribute an image depicting Minor Victim 1, a minor male, engaging in sexually explicit conduct, including but not limited to the lascivious display of the minor's genitals and pubic area.

18 U.S.C. § 2252(a)(2)

COUNT FIVE
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about May 6, 2019, in the District of Maryland and elsewhere, the defendant,

THOMAS MICHAEL MANNION, JR.,

did knowingly possess any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), which image had been shipped and transported using any means or facility of interstate and foreign commerce and in and effecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit: a Samsung Galaxy S8 Active cell phone, *SM-G892A*, *IMEI: 357712083387349* containing visual depictions of prepubescent and minor males and females engaged in sexually explicit activity, including:

FILE NAME
2.5 YO Boy.wmv
VID-20150403-WA0164.mp4
VID-20150524-WA0022.mp4

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

COUNT SIX
(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about May 6, 2019, in the District of Maryland and elsewhere, the defendant,

THOMAS MICHAEL MANNION, JR.,

did knowingly possess any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8), which image had been shipped and transported using any means or facility of interstate and foreign commerce and in and effecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit: an HP Pavilion G4 laptop, s/n: CNF11045RW, model: G4-1015dx containing visual depictions of prepubescent and minor males and females engaged in sexually explicit activity, including:

FILE NAME
1470565700777.jpg
1470565701176.jpg
1470565701821.jpg

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

FORFEITURE ALLEGATION

The allegations contained in Counts One through Six of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 2253.

Pursuant to Title 18, United States Code, Section 2253, upon conviction of the offense set forth in Counts One through Six of this Indictment, in violation of Title 18, United States Code, Sections 2251(a), 2252(a)(2), and 2252A(a)(5)(B) and (b)(2), the defendant,

THOMAS MICHAEL MANNION, JR.,

shall forfeit to the United States of America:

a. any visual depiction described in Title 18, United States Code, Sections, 2251, 2251A, 2252 or 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received or possessed in violation of this chapter;

b. any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of the offenses or any property traceable to such property; and

c. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses.

1. The property to be forfeited includes, but is not limited to, the following:

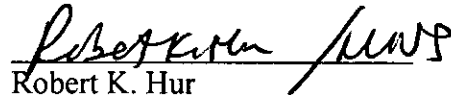
- a. HP Pavilion G4 laptop, s/n: CNF11045RW, model: G4-1015dx; and
- b. Samsung Galaxy J3 cell phone, model: SM-J327A, s/n: R28J432TLDM; and
- c. Samsung Galaxy S8 Active cell phone, SM-G892A, IMEI: 357712083387349.

2. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without

difficulty; the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and Title 28, United States Code, Section 2461(c).

18 U.S.C. § 2253
28 U.S.C. § 2461(c)


Robert K. Hur
United States Attorney

A TRUE BILL

SIGNATURE REDACTED

FOREPERSON

10/3/19
Date